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January 16, 2024

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Mary Harris v. F. Schumacher & Co., LLC
Index No.: 23-cv-05676 (MKV)

Dear Judge Vyskocil:


We represent Defendant F. Schumacher & Co., LLC (“Defendant”) in the above-referenced matter. In accordance with the Court’s Individual Practices, we write to respectfully request an extension of time for Defendant to respond to Plaintiff’s Opposition to Defendant’s Motion to Dismiss.

Defendant’s Reply Brief is currently due today, January 16, 2024. We write, with Plaintiff’s consent, to respectfully request a short extension of time, until January 23, 2024, to file Defendant’s Reply Brief. The additional time is necessary to provide Defendant with time to review the draft Reply Brief for submission. The undersigned is currently nine (9) months pregnant and has had more doctor’s appointments in the past week than initially anticipated. Unfortunately, this delayed counsel from being able to provide the Reply Brief to Defendant for their review and approval in advance of today’s deadline.

This is Defendant’s second request for extension of time to submit the Reply Brief. We do not anticipate a need for any further extensions. We thank the Court for its attention to this matter and all courtesies extended.


This request for an extension is GRANTED, even though the defense violated the Court’s Individual Rules of Practice, which provide that all requests for extensions must be made 48 hours before the deadline. No further extensions of the deadline to reply will be granted. Future failures to comply with the Court’s orders and Individual Rules may result in sanctions.

Respectfully submitted,
Kaufman Dolowich, LLP



Erika Rosenblum

Date: Jan. 18, 2024
New York, New York



Mary Kay Vyskocil
United States District Judge